

UN-
SEALED

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on September 30, 2004

05-439

UNITED STATES OF AMERICA)

CRIMINAL NO. _____

v.)

GRAND JURY ORIGINAL

VIOLATIONS:

ALEJANDRO TASCON-RODRIGUEZ
a/k/k "JUANITO,"

21 U.S.C. §§ 963, 952 and 959
Conspiring To Import Cocaine
and To Manufacture and
Distribute Cocaine Knowing and
Intending That It Will Be
Imported Into the United
States

Defendants.)

21 U.S.C. §959(a)
Manufacturing and Distributing
Cocaine Knowing and Intending
That It Will Be Imported Into
the United States

18 U.S.C. §2
Aiding and Abetting

BATES, J.JDB

INDICTMENT

FILED IN OPEN COURT

B

THE GRAND JURY CHARGES THAT:

DEC 08 2005

COUNT ONE

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

At all times relevant to the Indictment:

INTRODUCTION

1. [REDACTED] was a citizen of the Republic of Colombia and resided in Mexico.
2. ALEJANDRO TASCON-RODRIGUEZ, a/k/a/"Juanito," was a citizen of the Republic of Colombia and resided in Mexico.

Case Related To

04-01 & 04-129

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THE CONSPIRACY

3. Beginning at least by April, 2005 and continuing to on or about October, 2005, the exact dates being unknown to the Grand Jury, in the United States, Mexico, the Republic of Colombia, and elsewhere, the defendants [REDACTED] a [REDACTED] and ALEJANDRO TASCON-RODRIGUEZ, a/k/a "JUANITO," did knowingly and unlawfully combine, conspire, confederate and agree together and with others known and unknown to the Grand Jury to commit the following offenses against the United States: (1) to knowingly and intentionally import five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, into the United States from Mexico and the Republic of Colombia, in violation of Title 21, United States Code, Sections 952 and 960, and (2) to knowingly and intentionally distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending and knowing that such substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a) and 960.

OBJECT OF THE CONSPIRACY

4. It was the object of the conspiracy to transport cocaine by sea from the Republic of Colombia to Mexico, and then overland through Mexico and unlawfully into the United States.

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that:

5. [REDACTED] and others known and unknown to the Grand Jury provided cocaine from Colombia for the venture.

6. [REDACTED] ALEJANDRO TASCÓN-RODRÍGUEZ, a/k/a "JUANITO," and others known and unknown to the Grand Jury invested sums of money for the purchase of the cocaine in Colombia.

7. [REDACTED] ALEJANDRO TASCÓN-RODRÍGUEZ, a/k/a "JUANITO," and others known and unknown to the Grand Jury met with each other at various locations in Mexico City, Mexico to plan the importation and distribution of the cocaine into the United States.

OVERT ACT

8. On or about June 6, 2005, [REDACTED]
[REDACTED] and ALEJANDRO TASCÓN-RODRÍGUEZ, a/k/a "JUANITO," shipped at least 4.4 metric tons of cocaine on board three go-fast vessels into the territorial waters of Mexico.

All in violation of Title 21, United States Code, Sections 960, 963, and Title 18, United States Code, Section 2.

COUNT TWO

9. On or about June 6, 2005, [REDACTED]
[REDACTED] ALEJANDRO TASCÓN-RODRÍGUEZ, a/k/a "JUANITO," and others known and unknown to the Grand Jury, in Mexico, the United

States, and elsewhere, did knowingly distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, knowing and intending that such cocaine would be unlawfully imported into the United States,

In violation of Title 21, United States Code, Sections 959(a) and 960, and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

Upon conviction of the criminal violations alleged in Counts One and Two of the Indictment, the defendants, [REDACTED] and ALEJANDRO TASCON-RODRIGUEZ, a/k/a "JUANITO,"

(1) shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all respective right, title or interest which such defendants may have in:

(a) any and all money and/or property constituting, or derived from, any proceeds which such defendants obtained, directly or indirectly, as the result of the violations alleged in Counts One and Two of this Indictment; and

(b) any and all property used, in any manner or part, to commit, or to facilitate the commission of, the violations alleged in Counts One and Two of this Indictment.

(2) If any of said forfeitable property, as a result of any act

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U.S. District and Bankruptcy Courts
for the District of Columbia

A TRUE COPY

ANGELA D. CAESAR, Clerk

By: [Signature]
Deputy Clerk 4/28/10